

FILED 09 JUN 24 16 25 USDC-ORP

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

CR No. 09-170-MO

v.

SUPERSEDING INDICTMENT

**[18 U.S.C. §§ 1591, 2423,
2422, 2421, and 1589]**

**JAMES ALBERT JACKSON,
DONNICO TYREL JOHNSON, and
LISA MILES,**

Defendants.

THE GRAND JURY CHARGES:

**COUNT 1
Sex Trafficking
18 U.S.C. § 1591**

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON, and LISA MILES**, defendants herein, aided and abetted by others known and unknown to the grand jury, did the following acts, knowing that force, fraud, and coercion would be used to cause "A. K." to engage in commercial sex acts:

(a) Defendants, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON, and LISA MILES** did, in and affecting interstate commerce, recruit, entice, harbor, transport, provide and obtain by any means, "A. K."; and

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(b) Defendants, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON,** and **LISA MILES** did benefit, financially by receiving a thing of value, from participation in a venture which engaged in commercial sex acts. All in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).

COUNT 2
Sex Trafficking
18 U.S.C. § 1591

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON,** and **LISA MILES,** defendant herein, aided and abetted by others known and unknown to the grand jury, did the following acts, knowing that "A. K.", a female under the age of 18, would be used to engage in commercial sex acts:

(a) Defendants, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON,** and **LISA MILES** did, in and affecting interstate commerce, recruit, entice, harbor, transport, provide and obtain by any means, "A. K."; and

(b) Defendants, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON,** and **LISA MILES** did benefit, financially and by receiving a thing of value, from participation in a venture which engaged in commercial sex acts. All in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(2).

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COUNT 3
Transportation of Minors
18 U.S.C. § 2423

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON**, and **LISA MILES**, defendants herein, aided and abetted by others known and unknown to the grand jury, did knowingly transport "A. K.", a female under the age of 18, in interstate commerce from Seattle, State of Washington to Portland, State of Oregon, with the intent that "A. K." engage in prostitution. All in violation of Title 18, United States Code, Section 2423(a).

COUNT 4
Coercion and Enticement
18 U.S.C. § 2422

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON**, and **LISA MILES**, defendants herein, aided and abetted by others known and unknown to the grand jury, while using the mail or any facility or means of interstate or foreign commerce, did knowingly persuade, induce, entice, or coerce, "A. K.", a female under the age of 18, to engage in prostitution or in any sexual activity for which any person could be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2422(b).

COUNT 5
Mann Act
18 U.S.C. § 2421

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON, DONNICO TYREL JOHNSON**, and **LISA MILES**, defendants herein, aided and abetted by others known and

unknown to the grand jury, did knowingly transport, "A. K." in interstate commerce from Seattle, State of Washington, to Portland, State of Oregon, while having the intent that "A. K." engage in prostitution or in any sexual activity for which any person could be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2421.

COUNT 6
Forced Labor
18 U.S.C. § 1589

Beginning about May 2008 and continuing through on or about October 2008, in the District of Oregon and elsewhere, **JAMES ALBERT JACKSON**, defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly provide or obtain the labor or services of "A.K.", a female under the age of 18, by:

- (a) Threats of serious harm to, or physical restraint against "A.K." or another person;
or
- (b) Through means of any scheme, plan, or pattern intended to cause "A.K." to believe that, if she did not perform such labor or services, that she or another person would suffer serious harm or physical restraint.

All in violation of Title 18, United States Code, Sections 1589(1) and (2).

DATED this 24 day of June 2009.

A TRUE BILL

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Presented by:

KARIN J. IMMERGUT
United States Attorney


KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney